

### REMARKS

Claims 1-34 are pending in the present application. Claims 1, 15, 22 and 32 are the independent claims. As an initial matter, Applicant gratefully acknowledges the reconsideration and withdrawal of the previous rejections in connection with the present application.

In the Official Action, dated July 19, 2005, claims 1-2, 4-13, 15, 17-30, 32 and 34 were newly rejected under 35 U.S.C. § 103(a) as allegedly obvious over U.S. Patent No. 6,647,399 (Zaremba) in view of U.S. Patent No. 6,145,088 (Stevens). Claim 14 was rejected under 35 U.S.C. § 103(a) over Zaremba in view of Stevens, and further in view of U.S. Patent No. 6,038,379 (Fletcher et al.). Claims 3, 16, 31 and 33 were rejected under 35 U.S.C. § 103(a) over Zaremba in view of Stevens, and further in view of U.S. Patent No. 6,073,128 (Pongracz et al.).

The outstanding rejections are respectfully traversed, as follows.

#### Summary of the Invention

The present invention provides a way to restore a pre-defined collection of files to a particular time by restoring the last full backup embodying the backup target, the last computed cumulative backup embodying the backup target and possibly the incremental backups after the last computed cumulative backup, if there are any that relate to change in the backup target.

For instance, in an exemplary embodiment generally corresponding to claim 1, the invention provides a method for generating backup files in a computer system including generating a full backup file corresponding to a first time for a set of objects in the computer

system and generating one or more incremental files for the set of objects afterwards, wherein the one or more incremental files each are associated with the collective set of objects. The method further includes identifying a target object within the set of objects for the generation of cumulative backup files and then generating off-line one or more cumulative backup files corresponding to a second time (after the first time) for the target object.

### Zaremba

Zaremba relates to a backup operation of a target file. At least one operation is initiated to perform at least one delta backup of the target file to at least one delta backup set. A delta backup set includes changes made to a version of a full backup set of the target file generated at a first time. The at least one delta backup set is assigned a name component indicating the version of the full backup set generated at the first time subject to the delta backup and an operation is initiated to perform a full backup of the target file to a version of the full backup set at a second time. The second time follows the first time. A determination is made of all delta backup sets having the name component indicating the version of the full backup set generated at the first time during the full backup operation at the second time. An operation is initiated to render inactive the determined delta backup sets having the name component indicating the version of the full backup generated at the first time.

### Independent Claims 1 and 15

As stated above, claims 1-2, 4-13, 15, 17-30, 32 and 34 were rejected under 35 U.S.C. § 103(a) as obvious over Zaremba in view of Stevens. With respect to claims 1 and 15, the Official Action, on page 2, equates the disclosure of the Abstract of Zaremba and Col. 2, lines

26-44 with “generating a full backup file corresponding to a first time for a set of objects in the computer system” and “generating at least one incremental file for the set of objects after the first time, wherein each of the at least one incremental file is associated with the set of objects,” as recited in claims 1 and 15. However, as emphasized in *Italics and underlining* in the passages above, Zaremba discloses a system that performs a backup operation for a single file, not a set of objects, as claimed by Applicant. Stevens was cited for reasons related to off-line performance, but does not cure the above-identified deficiency of root reference Zaremba with respect to Applicant’s invention.

Accordingly, neither Zaremba nor Stevens, taken alone or in combination, teach or suggest at least generating a full backup file for a set of objects, then generating incremental file(s) for the set of objects wherein each of the incremental file(s) is associated with the set of objects, as recited in claim 1, and similarly in claim 15. Claims 2-14 and 16-21 directly or indirectly depend from claims 1 and 15, respectively, and are believed allowable for the same reasons. Reconsideration and withdrawal of the rejection to claims 1-21 under 35 U.S.C. § 103(a) is respectfully requested.

**Independent Claims 22 and 32**

As mentioned, claims 1-2, 4-13, 15, 17-30, 32 and 34 were rejected under 35 U.S.C. § 103(a) as obvious over Zaremba in view of Stevens. With respect to claims 22 and 32, the Official Action, on page 5, equates the disclosure of the Abstract of Zaremba, Col. 1, lines 49-56 and Col. 2, lines 26-61 with “a plurality of storage components for the storage of backup information for a plurality of target objects in the form of full, incremental and cumulative backup information, wherein the incremental and cumulative backup information

is associated with the collection of said plurality of target objects,” as recited in claims 22 and 32. However, as emphasized with respect to claims 1 and 15, Zaremba discloses a system that performs a backup operation for a single file, not a plurality of target objects, as claimed by Applicant. Stevens does not cure the above-identified deficiency of root reference Zaremba with respect to Applicant’s invention.

Accordingly, neither Zaremba nor Stevens, taken alone or in combination, teach or suggest at least “a plurality of storage components for the storage of backup information for a plurality of target objects in the form of full, incremental and cumulative backup information, *wherein the incremental and cumulative backup information is associated with the collection of said plurality of target objects*,” as recited in claims 22 and 32.

Claims 23-31 and 33-34 depend from claims 22 and 32, respectively, and are believed allowable for the same reasons. Withdrawal of the rejection to claims 22-34 under 35 U.S.C. § 103(a) is respectfully requested.

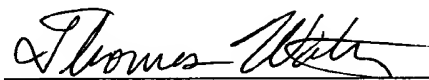
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**PATENT**

**CONCLUSION**

Applicant believes that the present Amendment is responsive to each of the points raised by the Examiner in the Office Action, and submits that Claims 1-34 of the application are in condition for allowance. Favorable consideration and passage to issue of the application at the Examiner's earliest convenience is earnestly solicited.

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